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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12

13 **RONNELL RAY HILL,**

Petitioner,

15 v.

16 **V.M. ALMAGER, Warden,**

Respondent.

C 07-3229 JSW (PR)

**DECLARATION OF ANN P.
WATHEN**

19 I, ANN P. WATHEN, declare as follows:

20 I am the Deputy Attorney General assigned to respond to the Order to Show Cause (OSC)
21 in the present case. The state appeals were denied in 2005 and 2006.

22 As discussed below, I am requesting an additional 60 days to respond to the petition for
23 writ of habeas corpus in the instant case. During the past two months, I have filed respondent's
24 briefs in *People v. Maldonado* (H031506) on March 7, 2008, *People v. Helton* (A115489) on April
25 1, 2008, and *People v. Colt* (A118129) on April 25, 2008. I am presently in the process of
26 completing a writ of mandamus/prohibition in *John Doe v. Brown* (San Mateo County Superior
27 Court, Case No. 466503). After completing the writ, I plan to work on respondent's opposition to
28 petitioner's motion for summary judgment in *Calloway v. White* (C 02-05882 RMW), and

1 respondent's brief in *People v. Kleder* (H031391), for which the court has issued a notice pursuant
2 to California Rules of Court, rule 8.220(a). In the last 60 days, I also attended an all-day hearing
3 in *John Doe v. Brown* (San Mateo County Superior Court, Case No. 466503) on March 4, 2008, and
4 oral argument in *People v. Anderson* (H030461) on April 15, 2008. With respect to the instant case,
5 I have obtained the file from storage as well as the state habeas petition filed with the California
6 Supreme Court (S147089) on October 4, 2006, and determined that petitioner has exhausted his
7 claims and that the federal habeas petition is timely.

8 WHEREFORE, respondent respectfully requests that the time for filing a response be
9 enlarged to June 28, 2008.

10 Dated: April 25, 2008

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12
13 /s/ Ann P. Wathen
14 ANN P. WATHEN
15 Deputy Attorney General

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